

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

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In Re:

Eric L. Pierce

Debtor

Case No.: 18-17860-RG

Judge: Gambardella

Chapter: 13

CHAPTER 13 DEBTOR'S CERTIFICATION IN OPPOSITION

The debtor in this case opposes the following (**choose one**):

1. ☐ Motion for Relief from the Automatic Stay filed by _____, creditor,

A hearing has been scheduled for _____, at _____.

- ☐ Motion to Dismiss filed by the Chapter 13 Trustee.

A hearing has been scheduled for _____, at _____.

- ☒ Certification of Default filed by Bank of America/US Bank Trust,

I am requesting a hearing be scheduled on this matter.

2. I oppose the above matter for the following reasons (**choose one**):

☒ Payments have been made in the amount of \$ 6,100.00, but have not been accounted for. Documentation in support is attached.

☒ Payments have not been made for the following reasons and debtor proposes repayment as follows (**explain your answer**):

Debtor got behind but made a payment in the amount of \$6,100.00 on 2-14-23, confirmation number 871435887.

☒ Other (**explain your answer**):

Debtor disputes amount owed. He was last current on 8-10-20. Since that time, he has made \$46,484.81 (including the 2-14-23 \$6100.00 payment) when he should have made \$46,754.87, leaving a balance of \$270.00 which is much less than the amount the Creditors has stated it is owed. Attached is Debtor's reconciliation.

3. This certification is being made in an effort to resolve the issues raised in the certification of default or motion.
4. I certify under penalty of perjury that the above is true.

Date: 2-14-23

/s/Eric L. Pierce
Debtor's Signature

Date: _____

Debtor's Signature

NOTES:

1. Under D.N.J. LBR 4001-1(b)(1), this form must be filed with the court and served on the Chapter 13 Trustee and creditor, if applicable not later than 7 days before the date of the hearing if filed in opposition to a Motion for Relief from the Automatic Stay or Chapter 13 Trustee's Motion to Dismiss.
2. Under D.N.J. 4001-1 (b)(2), this form must be filed with the court and served on the Chapter 13 Trustee and creditor, if applicable not later than 14 days after the filing of a Certification of Default.

Eric Pierce - Case #18-17860 (RG)		Mortgage Payments Reconciliation	
Dates 8/10/2020 to February 2023	Amount Due	Debtor Paid Total	Debtor Payments
2020 - 5 payments @1564.51	\$ 7,822.55	\$ 7,822.55	2020 - 5 payments @1564.51
2021 - 10 @ 1564.51 & 2@ 1454.99	\$ 18,555.08	\$ 20,658.95	\$ 1,564.51 \$ 3,130.00 \$ 1,564.51 \$ 3,130.00 \$ 1,564.51 \$ 3,130.00 \$ 1,564.51 \$ 3,130.00 \$ 1,564.51 \$ 3,130.00
2022 - 12* 1455.42	\$ 17,465.04	\$ 11,903.31	\$ 1,455.42 \$ 1,455.42 \$ 1,455.42 \$ 1,455.42 \$ 1,455.42 \$ 1,455.42 \$ 1,455.42 \$ 1,455.42 \$ 1,455.42 \$ 1,455.42
2023 - 2*1456.10	\$ 2,912.20	\$ 6,100.00	
	\$ 46,754.87	\$ 46,484.81	
Balance Due	\$ 270.06		